

1 KENNETH E. LYON III, ESQ.
2 ken@lyonlaw.net
3 Nevada Bar No. 7071
4 **LAW OFFICES OF KENNETH E. LYON, III**
5 432 Court Street
6 Reno, Nevada 89501
7 Telephone: 775.786.4188
8 **RICHARD M. SOX, ESQ.,**
9 **NICHOLAS A. BADER, ESQ.,**
10 **JEREMIAH HAWKES, ESQ.**
11 rsox@bsm-law.com
12 nbader@bsm-law.com
13 jhawkes@bsm-law.com
14 (*Pro Hac Vice*)
15 **BASS SOX MERCER**
16 2822 Remington Green Circle Tallahassee, Florida 32308
17 Telephone: 850.878.6404
18 *Attorneys for Herb Hallman Chevrolet, Inc.*

19
20 **UNITED STATES DISTRICT COURT**
21 **DISTRICT OF NEVADA**

22 HERB HALLMAN CHEVROLET, INC.,
23 D.B.A. CHAMPION CHEVROLET,

24 Plaintiff,

25 vs.

26 GENERAL MOTORS LLC,

27 Defendant

28 Case No.: 3:22-CV-00447-MMD-CLB

29
30 **ORDER GRANTING PLAINTIFF'S**
31 **UNOPPOSED MOTION FOR**
32 **EXTENSION OF TIME TO RESPOND**
33 **TO DEFENDANT'S MOTION FOR**
34 **SUMMARY JUDGMENT (FIRST**
35 **REQUEST)**

36 Pursuant to Federal Rule of Civil Procedure 6(b)(1)(A), and Local Rules IA 6-1(a)
37 and IA 6-2, Plaintiff Herb Hallman Chevrolet, Inc., d/b/a Champion Chevrolet ("Plaintiff"
38 or "Champion"), hereby files this Unopposed Motion for Extension of Time to Respond
39 to Defendant's Motion for Summary Judgment (ECF No. 68), filed by Defendant, General
40

1 Motors, LLC (“Defendant” or “GM”) on September 9, 2024. This is the first request for an
2 extension of this deadline. In support thereof, Plaintiff states as follows:
3

4 1. On September 9, 2024, Defendant filed its Motion for Summary Judgment
5 (ECF No. 68).

6 2. Plaintiff’s response to the same is presently due on September 30, 2024.

7 3. As of the filing of the instant Motion, a dangerous weather system has
8 developed in the Gulf of Mexico.

9 4. The weather system is expected to develop into Hurricane Helene and
10 make landfall in the Big Bend region of Florida’s panhandle – where counsel for Plaintiff
11 is located – between late Thursday, September 29, 2024 and Friday, September 30, 2024.
12

13 5. In preparation for Helene’s impending landfall, Plaintiff’s counsel’s
14 Tallahassee, Florida office will likely be closed from at least Thursday, September 29, 2024
15 through Friday, September 30, 2024.

16 6. As such, Plaintiff respectfully requests that this Honorable Court enter an
17 order extending Plaintiff’s deadline to respond to Defendant’s Motion for Summary
18 Judgment by one (1) week.

19 7. In accordance with Federal Rule of Civil Procedure 6(b)(1)(A) and LR IA 6-
20 1(a), Plaintiff submits that good cause exists to extend the deadline to respond.
21

22 8. Such request is not made for the purposes of delay; this is Plaintiff’s first
23 request for an extension of this deadline; and no other deadlines in the case schedule will
24 be disturbed by granting such relief.
25

1 WHEREFORE, Plaintiff requests that the Court extend the time until October 4,
2 2024, for Plaintiff to respond to GM's Motion for Summary Judgment.
3

4 LOCAL RULE IA-3 DECLARATION OF CONFERRAL

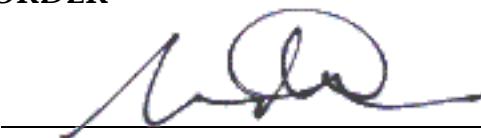
5 The undersigned conferred with counsel for Defendant regarding the requested
6 extension via electronic mail on September 23, 2024. On the same day, counsel for GM
7 advised that GM consents to a one-week extension of Plaintiff's deadline to respond to
8 GM's Motion for Summary Judgment.
9

10 Respectfully Submitted,

11 */s/Nicholas A. Bader*
12 **KENNETH E. LYON, III**
13 Nevada Bar No. 7071
14 **LAW OFFICES OF KENNETH E.**
15 **LYON, III**
16 432 Court Street
17 Reno, Nevada 89501
18 **BASS SOX MERCER**
19 Nicholas A. Bader (*pro hac vice*)
20 Jeremiah M. Hawkes (*pro hac vice*)
21 2822 Remington Green Circle
22 Tallahassee, Florida 32308

23 ORDER

24 IT IS SO ORDERED.

25 
UNITED STATES DISTRICT JUDGE

26 DATED: September 24, 2024

CERTIFICATE OF SERVICE

I certify that a true copy of the above was filed using the Court's CM/ECF system and thus served upon counsel for each party on September 24, 2024

/s/ *Nicholas A. Bader*
Nicholas A. Bader